

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

Case No. 15-cv-07433-LAP

**DECLARATION OF SIGRID S.  
MCCAWLEY**

I, Sigrid S. McCawley, hereby declare as follows:

1. I represent the Plaintiff, Virginia L. Giuffre, in the above-captioned matter.
2. Pursuant to this Court's August 26, 2020, order directing the Original Parties to serve Non-Party Notices on all remaining Non-Parties, ECF No. 1107, the Original Parties agreed to split responsibility for mailing the Non-Party Notices.
3. Defendant's counsel agreed to serve the Non-Party Notices to J. Doe 1 through J. Doe 91, while I agreed to serve the Non-Party Notices to J. Doe 92 through J. Doe 185.
4. Pursuant to the updated Order and Protocol for Unsealing Decided Motions, ECF No. 1108, I used best efforts to identify the most current addresses for J. Doe 92 through J. Doe 185.
5. I mailed the following documents to the Non-Parties listed in paragraphs six and seven below: (1) Notice to Non-Parties of Possible Unsealing of Sealed Documents, ECF No. 1044; (2) Non-Party's Request for Excerpts of Sealed Documents and Acknowledgement

of Court Order and Protocol Governing the Excerpts, *id.*; (3) Non-Party's Objection to Unsealing, *id.*; and (4) the Order and Protocol for Unsealing Decided Motions (Updated August 27, 2020). ECF No. 1108.

6. On September 10, 2020, I sent the Non-Party Notices via first-class certified mail (return receipt requested) and, for international addresses, via FedEx, to the following Non-Parties:

- J. Doe 92
- J. Doe 93
- J. Doe 94
- J. Doe 95
- J. Doe 96
- J. Doe 99
- J. Doe 102
- J. Doe 103
- J. Doe 105
- J. Doe 106
- J. Doe 107
- J. Doe 108
- J. Doe 109
- J. Doe 110
- J. Doe 113
- J. Doe 115
- J. Doe 117
- J. Doe 119
- J. Doe 120
- J. Doe 121
- J. Doe 122
- J. Doe 123
- J. Doe 125
- J. Doe 126
- J. Doe 127
- J. Doe 128
- J. Doe 129
- J. Doe 130
- J. Doe 131
- J. Doe 133
- J. Doe 134
- J. Doe 136
- J. Doe 138
- J. Doe 139
- J. Doe 140
- J. Doe 141
- J. Doe 142
- J. Doe 143
- J. Doe 144
- J. Doe 145
- J. Doe 147
- J. Doe 148
- J. Doe 150
- J. Doe 151
- J. Doe 153
- J. Doe 154
- J. Doe 155
- J. Doe 157
- J. Doe 160
- J. Doe 163
- J. Doe 164
- J. Doe 167
- J. Doe 169
- J. Doe 172
- J. Doe 173
- J. Doe 176
- J. Doe 179
- J. Doe 180
- J. Doe 181
- J. Doe 183
- J. Doe 184
- J. Doe 185

7. On September 11, I sent the Non-Party Notices via first-class certified mail (return receipt requested) and, for international addresses, via FedEx, to the following Non-Parties:

- J. Doe 97
- J. Doe 101
- J. Doe 116
- J. Doe 162
- J. Doe 168
- J. Doe 174
- J. Doe 177

8. I have not sent Non-Party Notices to the following Non-Parties because, using best efforts, I have been unable to locate an address for them:

<ul style="list-style-type: none"><li>• J. Doe 98</li><li>• J. Doe 100</li><li>• J. Doe 111</li><li>• J. Doe 112</li><li>• J. Doe 114</li><li>• J. Doe 118</li><li>• J. Doe 124</li><li>• J. Doe 135</li><li>• J. Doe 137</li><li>• J. Doe 146</li></ul>	<ul style="list-style-type: none"><li>• J. Doe 149</li><li>• J. Doe 152</li><li>• J. Doe 158</li><li>• J. Doe 159</li><li>• J. Doe 161</li><li>• J. Doe 165</li><li>• J. Doe 166</li><li>• J. Doe 170</li><li>• J. Doe 171</li><li>• J. Doe 175</li><li>• J. Doe 178</li></ul>
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9. I have not sent the Non-Party Notice to the following deceased Non-Parties:

- J. Doe 104
- J. Doe 132
- J. Doe 156
- J. Doe 182

I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: September 11, 2020

Respectfully Submitted,

/s/ Sigrid S. McCawley

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